

Ref: Tmobile/ATT merger

To whom it my concern:

I write to express my opposition to the proposed merger between AT&T and T-Mobile. Simply stated, reducing competition leads to increased price, reduced services and innovation and higher prices for consumers. The only winner will be AT&T and its stockholders.

The merger will result in the wireless industry becoming dangerously close to a duopoly. With AT&T's purchase of T-Mobile, AT&T and Verizon would have approximately 80 percent of US market.

The merger will result in fewer handset choices for consumers. Carriers control wireless handset sales in the US. This has resulted in the carriers limiting the number of handsets available at prices consumers find acceptable.

The merger will result in reduced customer care quality and higher plan prices. Generally the merged company takes on the pricing and customer service policies of component. T-Mobile is known for its better customer service while AT&T is not.

T-Mobile pricing is generally lower than ATT and T-Mobile customers will eventually be rolled onto AT&T plans. AT&T has said it intends to use T-Mobile's 3G spectrum for LTE, making T-Mobile 3G phones and plans redundant.

The merger will result in less innovation. For example T-Mobile does not have the breadth of spectrum that AT&T possesses and is making innovative use of HSPA+ to work around its bandwidth limitation. AT&T will not have any incentive to innovative and find frugal solutions.

The merger will also result in a virtual monopoly on GSM service. GSM is the worlds leading mobile technology. AT&T and T-Mobile are both GSM system carriers. All other carriers in the US use CDMA or other systems which are not compatible with GSM. This will result in monopoly pricing, especially in roaming and international rates. Also, merging the two carriers would create only one U.S. customer for the global GSM equipment market, making all of the combined carrier's phones U.S. exclusives.

AT&T's argument about needing spectrum is disingenuous. All wireless carriers will eventually need more spectrum. A recent CNET article shows AT&T is currently *"sitting on more spectrum than any other wireless operator in the top 21 markets in the U.S., and about a third of that spectrum is still being unused"*. AT&T's well-known capacity problems are probably not due to lack of spectrum, but because of a lack of planning, capital spending. Purchasing T-Mobile will do nothing in this regard.

If the FCC does approve this merger, in my view the only way to maintain wireless competition in the U.S. would be to adopt a "common carrier" rule for the new AT&T network. AT&T must be required to offer wholesale voice and 4G data service, at attractive and regulated rates, to any virtual network operator that wants to compete. Similar to what happened to AT&T's monopoly on long distance service in the past.

The U.S. leads in wireless innovation. Let's keep moving in that direction, unlike the home internet market which is lagging behind many nations globally, and maintain our innovation and competitiveness. This merger would be a step in that negative direction.